

March 1, 2016

**VIA ELECTRONIC FILING**

Honorable Cathy L. Waldor, U.S.M.J.  
United States District Court for the District of New Jersey  
Courtroom MLK5D  
Martin Luther King Building and U.S. Courthouse  
50 Walnut Street Room 4C  
Newark, New Jersey 07101

**Re: *Casagrand, et al. v. Gannet Co., Inc. et al.***  
**U.S. District Court, District of New Jersey, No. 2:14-cv-00022**

Dear Judge Waldor:

In accordance with the Court's January 19, 2016 Order (Dkt. 53), Plaintiffs Richard Casagrand and Dylan Schlossberg, along with Defendants Gannett Co. Inc. and Marketing Plus, Inc. (collectively, the "Parties"), write to update the Court on the status of their settlement efforts.

On February 3, 2016, the Parties attended a mediation with The Honorable Wayne R. Andersen (ret.) of JAMS (Plaintiffs and Gannett appeared in person; counsel for MPI appeared telephonically). Although a resolution was not reached that day, the parties have continued their settlement discussions and have agreed to engage Judge Andersen to facilitate their efforts. The Parties are in the process of scheduling the next mediation session and, subject to Judge Andersen's availability, intend to proceed in March or early April in Chicago. The Parties will inform the Court of their mediation date during the telephonic status conference currently set for March 11, 2016 at 11:00 AM EST.

Accordingly and in an effort to continue to conserve the resources of the Parties and the Court, the Parties respectfully request that the Court continue the stay of discovery in this matter for another forty-five (45) days, at which point (if not sooner) the Parties will submit a further joint report regarding the status of their settlement efforts.

| Thank you for your time and attention in this matter.

Respectfully submitted,

/s/ Eve-Lynn J. Rapp  
Attorney for Plaintiffs

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Respectfully submitted,

/s/ Matthew Fedor  
*Attorney for Gannett Co., Inc.*

Respectfully submitted,

/s/ Elliott Pell  
*Attorney for Marketing Plus, Inc.*